

Exhibit B



Sarah Cohen <sarah@tomorrowlaw.com>

VXN - Defendant's Meet and Confer Prior to Filing 12(b)(6) to Plaintiff's First Amended Complaint

Sarah Cohen <sarah@tomorrowlaw.com>

Mon, Oct 9, 2023 at 9:36 PM

To: Eric Clopper <eclopper@kanelaw.la>

Cc: "jeff@tomorrowlaw.com" <jeff@tomorrowlaw.com>, "david@tomorrowlaw.com" <david@tomorrowlaw.com>, Brad Kane <bkane@kanelaw.la>, thomavvxngrouppllcetaz11731883@projects.filevine.com, Emanuel Munguia <emanuel@tomorrowlaw.com>, Nadia Rodriguez <nadia@tomorrowlaw.com>, Rafael Yedoyan <rafael@tomorrowlaw.com>

Hi Eric,

I hope you had a nice weekend. I am unavailable for a call on those days but can make Friday afternoon work. How does Friday look for you? Please note while I am always willing to meet and confer in good faith, this particular meet and confer cannot possibly be in compliance with LR 7-3 as that Rule requires the meet and confer to take place at least 7 days prior to the filing of the motion. Defendants' deadline to respond to the First Amended Complaint was October 4, 2023 and therefore Defendants' deadline to meet and confer was September 27, 2023. While Defendants filed a Motion to Extend Responsive Pleading deadline to October 18, 2023, the Court has not granted any extension and neither has Plaintiff. Thus, please do not refer to the meet and confer as "in compliance with Local Rule 7-3" as that ship sailed. Further, any 12(b)(6) Motion filed by Defendants is untimely as it was due on or before October 4, 2023 as neither the Court nor Plaintiff granted an extension to October 18, 2023.

Thank you.

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